

**THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

FELISHATAY ALVARADO,
Plaintiff,

v.

CITY OF PHILADELPHIA, et al.,
Defendants.

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**Civil Action
No. 22-3763**

**DEFENDANTS' MOTION *IN LIMINE* TO PRECLUDE THE TESTIMONY AND
REPORT OF DR. VERONIQUE VALLIERE**

Defendants City of Philadelphia; Police Officers Joshua Burkitt, Eric Clark, Jose Hamoy, Brian Murray, Patrick Saba, Edward Song; and Sgt. Kevin Mellody; and Lt. Demetrius Monk (collectively “the Defendants”), by and through undersigned counsel, respectfully moves this honorable Court, pursuant to Federal Rule of Civil Procedure 702, for the entry of an order precluding Dr. Valliere’s opinion testimony on the basis that: (1) Dr. Valliere’s opinions exceed her qualifications; (2) Dr. Valliere’s methodology is not reliable; and (3) Dr. Valliere’s opinion does not “fit” the facts at issue in this case.

Date: August 29, 2024

Respectfully submitted,

/s/ Emily Hoff

EMILY HOFF, ESQUIRE

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/s/ Jonah Santiago-Pagán

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